

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA

DANIEL EDWARD CVIJANOVICH,

Plaintiff,

v.

UNITED STATES SECRET SERVICE,

Defendant.

Case No. 3:18-cv-220

**UNITED STATES  
SECRET SERVICE'S MOTION FOR  
SUMMARY JUDGMENT**

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, the United States of America by Drew H. Wrigley, United States Attorney for the District of North Dakota, and James Patrick Thomas, Assistant United States Attorney, on behalf of the United States Secret Service (the "Secret Service"), moves for summary judgment holding that the Secret Service has complied with its obligations under the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552, with respect to the FOIA request of Daniel Edward Cvijanovich ("Plaintiff").

This motion is based upon the memorandum of law filed herewith, the accompanying declarations (one publically filed, and one filed under seal, for ex parte, in camera review), and all the files and proceedings in this case. There is no genuine issue as to any material fact and the Secret Service is entitled to judgment as a matter of law.

DREW H. WRIGLEY  
United States Attorney

Dated: May 30, 2019

By: /s/ James Patrick Thomas  
JAMES PATRICK THOMAS  
Assistant United States Attorney  
P.O. Box 699  
Bismarck, ND 58502-0699  
(701) 530-2420  
ND Bar Board ID No. 06014  
james.p.thomas@usdoj.gov  
Attorney for United States Secret Service

**CERTIFICATE OF SERVICE**

I hereby certify that on May 30, 2019, the foregoing document was filed electronically with the Clerk of Court through ECF.

I further certify that a copy of this document was sent via FedEx, for Standard Delivery [TRK# 7753 4390 4432], to non-ECF participating party:

Daniel Edward Cvijanovich  
2433 20th Ave. S., Apt. 305  
Fargo, ND 58103

Dated: May 30, 2019

/s/ James Patrick Thomas  
JAMES PATRICK THOMAS  
Assistant United States Attorney